

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

INSPIRED PURSUITS, LLC,
QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC, KIRK
GRUNDAHL, and SUZANNE
GRUNDAHL

Plaintiffs,

v.

PARAGON COMPONENT SYSTEMS,
LLC, JOHN HOLLAND, JAMES
HOLLAND, CLEARSPAN
COMPONENTS, LLC, ANDREW EWIN,
DAVID REED, SCOTT HOELSMA, SETH
DUNCAN, MICHAEL PITTS, AVERY
RADMACHER, NATHAN BIEREMA,
JEREMY BIEREMA, ROB EASON, and
THE ESTATE OF DANIEL HOLLAND EX
REL. SPECIAL EXECUTOR MARVIN B.
SPEED,

Defendants

Case No.: 3:25-CV-00075

DECLARATION FOR JAMES HOLLAND

I, James Holland, hereby declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth in this declaration. I make this declaration in support of the motion to dismiss the complaint for lack of personal jurisdiction.

2. I am a resident and domiciled in the State of Mississippi. I have lived and worked in Mississippi at all times relevant to the allegations in the Complaint.

3. I have not owned, rented, or leased property in Wisconsin. I do not maintain a mailing address, bank account, or telephone listing in Wisconsin. I do not pay taxes in Wisconsin.

4. I am a current employee of Clearspan Components, Inc., a corporation organized under the laws of Mississippi. My employment is based in Mississippi.

5. To the best of my recollection, I have been to Wisconsin three (3) times.

6. In the fall of 2024, I was in Milwaukee, Wisconsin, for the Building Component Manufacturers Conference ("BCM Conference").

7. In the fall of 2018, I was in Milwaukee, Wisconsin, for the BCM Conference. Included in the BCM Conference, was a tour of the Structural Building Components Research Institute, owned by the Structural Building Component Association.

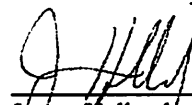
8. During both fall trips, I did not visit any site owned by the Grundahls.

9. On May 28, 2018, my dad and I visited Madison, Wisconsin. Although we met with Kirk and Suzi Grundahl, the purpose of this meeting was very surface level and more of a "meet and greet". I do not recall any business plans or agreements being discussed during this meeting; and certainly no agreements were signed or entered into.

10. Being forced to defend this lawsuit in Wisconsin would impose an undue burden on me. I have no reasonable expectation of being haled into court in Wisconsin.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 7th day of April 2025.



James Holland